

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS - FORT WORTH DIVISION**

JOSEPH FRIEDHEIM,
IASMIN FRIEDHEIM, and
J.F. SOLUTIONS LTD.,
Plaintiffs/Counter-Defendants

v.

THOMAS HOEBER, and
Defendant/Counter-Plaintiffs
HÖEBER MEDIA, LLC,
Defendant/Intervenor

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Civil Action No. 4:20-cv-335

PLAINTIFFS' PRETRIAL DISCLOSURES

Plaintiffs Joseph Friedheim, Iasmin Friedheim, and JF Solutions LTD ("Plaintiffs") file and serve these, their pretrial disclosures pursuant to Fed. R. Civ. P. 26(a)(3)(A)–(B).

Plaintiffs reserve the right to amend or supplement these disclosures as appropriate. Plaintiffs may also ask the Court to consider complete documents or expand deposition testimony too narrowly tailored.

Respectfully Submitted,

Norred Law, PLLC
/s/ Warren V. Norred
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Attorney for Defendant and Intervenor

CERTIFICATE OF SERVICE - I certify that on August 18, 2021, this document was served on Brian Casper, counsel for Thomas Hoeber and Höeber Media, LLC via ECF.

/s/Warren V. Norred
Warren V. Norred

WITNESSES LIST

Plaintiffs expect to call all named parties as listed in the caption of this case, all of whom may be reached through the mailing address and phone numbers of their counsel of record and are expected to give testimony at trial.

In addition, Plaintiff may present the following witnesses:

1. **Minez Cassamo Velgi** (a.k.a. Kini Cassamo)
Mailing address: CL Pamplona, 5, 006° B, 20008 – Donostia-San Sebastian, Donostia / San Sebastian (Gipuzkoa).
Phone number: (+011) 346 535 735 63
2. **Nuno Manuel Valente Rodriguez Maldonado Tuna** (a.k.a. Nuno Tuna)
Mailing address: Mailing address is unknown, witness resides in Lisbon, Portugal.
Phone number: Unknown.
3. **Warren V. Norred**, the undersigned, as Plaintiffs' Counsel

If the need arises, Plaintiffs may also call:

4. **Marina Duarte Brás**
Mailing address: Estrada Nacional 114 n°21-A, 2510-425 Amoreira – Óbidos, Portugal
Phone number: (+351) 262 969 479
5. **Luis Alfonso Fidalgo**
Mailing address: Praceta Jose Luis Rufino, N11, 2560-254 Torres Vedras, Portugal
Phone number: (+351) 261 099 545
6. **Francisco Miguel Farinha**
Mailing address: Praceta Jose Luis Rufino, N11, 2560-254 Torres Vedras, Portugal
Phone number: (+351) 261 099 545

EXHIBIT LIST

Plaintiffs expect to offer the following documents as exhibits during trial:

Hoeber production:

<u>Bates/Exhibit No.</u>	<u>Description</u>	<u>Objection</u>	<u>Admitted</u>
HOEBER_7	May 14, 2019 email between Hoeber and Nuno Tuna re label project		
HOEBER_10-14	May 5, 2019 Agreement between Hoeber Media and Nuno Tuna		
HOEBER_77-82	July 16, 2019 Hoeber copyright registration		
HOEBER_88	May 16, 2016 email between Hoeber and Iasmin Friedheim re Final art		
HOEBER_112-14	May 20, 2016 email between Iasmin Friedheim and Nuno Tuna re How are you doing?		
HOEBER_117-20	May 20, 2016 email between Iasmin Friedheim and Tuna		
HOEBER_154-59	May-June 2016 Emails between Hoeber and Nuno Tuna re JFS graphic materials		
HOEBER_421	August 21, 2016 email from Hoeber to Joe Friedheim		
HOEBER_425	August 29, 2016 email between Hoeber to Joe Friedheim re Applications		
HOEBER_470-72	October 6, 2016 email between Hoeber and Friedheims re Payment Schedule		
HOEBER_517-518	Nov. 2016 email exchange between Thomas Hoeber and Iasmin Friedheim re About your text		
HOEBER_580	January 5, 2019 email from Hoeber to Joe Friedheim re Last email about your payment		
HOEBER_587-88	June 25, 2018 email from Hoeber to Joe Friedheim re Marketing List of Priorities for Review		
HOEBER_591-92	July 15, 2018 email and invoice from Hoeber to Joe Friedheim		
HOEBER_680	Aug 10, 2018 email from Hoeber to Joe and Iasmin Friedheim re invoices from Hoeber media		

HOEBER_699	September 18, 2018 from Hoeber to Iasmin Friedheim re 9/18/18 Workload Outcome		
HOEBER_790-91	December 2018 emails between Joe Friedheim and Hoeber re Moving on Transition		
HOEBER_800-01	January 4, 2019 email from Hoeber to Joe and Iasmin Friedheim re Resolution		
HOEBER_804	February 14, 2019 email from Thomas Hoeber to Joe and Iasmin Friedheim re Settlement Discussion		
HOEBER_908	February 11, 2019 from Thomas Hoeber to Joe Friedheim re Website services		
HOEBER_909-10	December 2018 emails between Joe Friedheim and Thomas Hoeber re Moving on Transition		
HOEBER_1546-58	October 23, 2016 invoices from Hoeber Media to JFS		
HOEBER_1829-30	June 3, 2019 Copyright assignment from Thomas Hoeber to Hoeber Media		

JF Solutions Production and Filings:

<u>Bates/Exhibit No.</u>	<u>Description</u>	<u>Objection</u>	<u>Admitted</u>
JFS 100023-25	Quote from Nuno Tuna to JFS		
JFS 100057-60	March 2016 text thread between Iasmin Friedheim and Kini Cossamo re copyright materials		
JFS 100055	May 24, 2016 email from Kini Cassamo to Joe and Iasmin Friedheim re Ginja Bottles - Still need correct Files		
JFS 100061	U.S. Registration of JFS copyright materials		
JFS 100062-67	U.S. Certificate of Registration of JFS copyright materials		
JFS 100069-99	JFS Disputed copyright materials		
JFS 100168-266	JFS promotional materials		
JFS 30001-3	May 19, 2016 Portuguese Copyright Registration Receipt		
JFS-30004-6	Assignment of rights in copyright from Kini Cassamo to JFS		
JFS 300007-9	Declaration of Kini Cassamo		
3 rd Amended Complaint Ex. A	Cancelled Checks		
3 rd Amended Complaint Ex. G	August 28, 2015 Fruitobidos Trademark Registration		
Plaintiff's Response and Obj. to Hoeber MSJ Ex A	Declaration of Marina Duarte Bras		
Plaintiff's Response and Obj. to Hoeber MSJ Ex. B	Declaration of Luis Afonso Fidalgo		
Plaintiff's Response and Obj. to Hoeber MSJ Ex. C	Declaration of Nuno Tuna		
Plaintiff's Att'y Fee Invoices	Plaintiff will provide a full time/task listing of fees concurrent with the exchange of exhibits		